

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of:

CHEVRON CORPORATION, et al.,

Applicants,

for an Order Pursuant to 28 U.S.C. § 1782 to
Conduct Discovery for Use in Foreign Proceedings

Index No. 10-mc-0002 (LAK)

**NOTICE OF MOTION FOR
LEAVE TO WITHDRAW AS
COUNSEL**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jonathan S. Abady, dated February 7, 2011, Emery Celli Brinckerhoff & Abady LLP will respectfully move this Court before the Honorable Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York, 10007, at such time as counsel may be heard, for leave to withdraw as counsel for the Lago Agrio Plaintiffs, pursuant to Local Rule 1.4.¹

¹ The Ecuadorian Plaintiffs include: Daniel Carlos Lusitande Yaiguaje, Venacio Freddy Chimbo Grefa, Miguel Mario Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje, Simón Lusitande Yaiguaje, Armando Wilmer Piaguaje Payaguaje, Javier Piaguaje Payaguaje, Fermín Piaguaje, Luis Agustín Payaguaje Piaguaje, Emilio Martín Lusitande Yaiguaje, Reinaldo Lusitande Yaiguaje, María Victoria Aguinda Salazar, Carlos Grega Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandra Aguinda, Clide Ramiro Aguinda Aguinda, Luis Armando Chimbo Yumbo, Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda Aguinda, Patricio Alberto Chimbo Yumbo, Segundo Ángel Amanta Milán, Francisco Matías Alvarado Yumbo, Olga Gloria Grefa Cerdá, Narcisa Tanguila Narváez, Bertha Yumbo Tanguila, Lucrecia Tanguila Grefa, Francisco Víctor Tanguila Grefa, Rosa Teresa Chimbo Tanguila, María Clelia Reascos Revelo, Heleodoro Patarón Guaraca, María Viveros Cusangua, Lorenzo José Alvarado Yumbo, Francisco Alvarado Yumbo, José Gabriel Revelo Llore, Luisa Delia Tanguila Narváez, José Miguel Ipiales Chicaiza, Hugo Gerardo Camacho Naranjo, María Magdalena Rodríguez, Elías Piyahuaje Payahuaje, Lourdes Beatriz Chimbo Tanguila, Octavio Córdova Huanca, Celia Irene Vivero Cusangua, Guillermo Payaguaje Lucitande, Alfredo Payaguaje, and Delfín Payaguaje.

Respectfully submitted,

Dated: February 7, 2011
New York, New York

**EMERY CELLI BRINCKERHOFF
& ABADY LLP**

/s/ Jonathan S. Abady

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